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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Unicorn Egg, Inc. d/b/a Love in Faith,

Plaintiff,

vs.

Loveinfaith.shop, aka Singulize.com,
aka Cubitile.com, aka, toughion.com,
aka riseive.com,

Defendants.

Case No. 2:24-cv-00983-RGK-AJR

~~PROPOSED~~ JUDGMENT ON
MOTION FOR ENTRY OF
DEFAULT JUDGMENT

Date: September 3, 2024

Time: 9:00 a.m.

Ctrm: 850, 8th Floor

Judge: R. Gary Klausner

Having considered Plaintiff's Motion for entry of Judgement based on the default of Defendant, following the Clerk's entry of default, the Court Orders as follows:

This Order applies to (1) Defendant's use of the domain name Loveinfaith.shop or any domain name variant of Loveinfaith.shop that, within the domain name, joins the word "love" with the word "faith", whether as a website location, a website address, an email address, or any other web-based means of identification or communication, (2) any and all other activity by Defendant amounting to cybersquatting within the meaning of 15 U.S.C. § 1117(d), and (3) any and all other retail sales activity by Defendant that infringes the Unicorn Marks.

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Judgment to be Entered:

1. *Damages:*

- a. \$100,000 as available under the Anticybersquatting Consumer Protection Act for the bad faith use and registration by Defendant incorporating the “Love in Faith” trademark, Loveinfaith.shop: \$100,000
- b. Single statutory damage award of \$1,000,000 for trademark counterfeiting;
- c. Attorneys’ fees on proof of willful trademark infringement: \$27,600
- TOTAL DAMAGES: \$1,127,600**

2. *Injunctive relief:*

- a. Defendant, its successors, heirs, assigns, related entities, administrators, agents, servants or employees is permanently enjoined from registering or using the word “Love” joined with the word “Faith” in any manner designed to confuse the reader or consumer that the usage represents Plaintiff’s d/b/a Love in Faith, or that merchandise listed for sale constitutes the merchandise Plaintiff sells under that name, and/or any other use or misuse of the word “Love” joined with the word “Faith” that conveys the impression that it represents an association with Plaintiff.
 - b. Defendant, its successors, heirs, assigns, related entities, administrators, agents, servants or employees are permanently enjoined from using social media and/or social media platforms, including but not limited to, Facebook, TikTok, and Instagram, to engage in the marketing of products employing the Unicorn Marks or any terms confusingly similar thereto.
 - c. Defendant is permanently enjoined from inserting links to websites or other platforms that promote Defendant’s, its successors’, heirs’, assigns’, related entities’, administrators’, agents’, servant’s or employee’s unauthorized marketing and sales of infringing merchandise.
 - d. Defendant is permanently enjoined from any and all other infringing uses
- Defendant, its successors, heirs, assigns, related entities, administrators,

agents, servants or employees may design for the purpose of marketing and selling products employing the Unicorn Marks or any terms confusingly similar thereto and to immediately cease and desist using the Unicorn Marks or any terms confusingly similar thereto.

e. Defendant, at Unicorn's request, is ordered to pay the cost necessary for Unicorn to correct any erroneous impression the consuming public may have received or derived concerning the nature, characteristics, or qualities of Defendant's products or services, including without limitation, the placement of corrective advertising and providing written notice to the public.

Service of Order

Plaintiff is directed to serve this Order on Defendant by previously authorized electronic means using all email addresses Defendant is known to have (1) used in its activities that infringed the Unicorn Marks, (2) promoted consumer retail sales by use of the Loveinfaith.shop domain name, or (3) promoted consumer retail sales by use of images and imagery copied from Plaintiff's Loveinfaith.shop domain name. These email addresses are:

WEBSITE AND "SUPPORT" EMAIL ADDRESSES	
1.	Loveinfaith.shop, having no apparent email address of its own, via email addresses previously authorized for email service of process: service@cubitile.com, service@toughtion.com, riseive@ytsghd.com , and service@singulize.com
2.	service@singulize.com
3.	service@cubitile.com
4.	service@toughtion.com
5.	riseive@ytsghd.com

1	6. service@halitior.com
2	7. service@raucade.com
3	8. service@alloior.com
4	9. service@vetate.com
5	10. service@vitukin.com,
6	11. service@acetoant.com
7	12. service@laboreer.com
8	13. service@dreameous.com
9	14. service@amongacle.com
10	15. service@fenswhat.com
11	16. service@dichosity.com
12	17. service@telress.com
13	18. service@mountature.com
14	19. service@lyzorium.com
15	20. service@practiceor.com
16	21. service@brachyine.com
17	22. service@manyuous.com
18	23. service@presbylet.com
19	24. service@piandette.com
20	25. service@pygfold.com
21	26. service@pandeous.com
22	27. support@lovellx.com
23	28. service@restette.com
24	29. service@glbaej.com
25	30. service@spiceur.com
26	31. inquiries@pherhood.com
27	32. support@qodinoae.com
28	

1 33. support@pezcel.com

2 34. help@hexleadtic.com


3 35. help@cleithring.com

4 36. help@fodibility.com

5 37. service@telress.com

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7 Unicorn is entitled to seek such further relief as may be necessary to obtain
8 Defendant's compliance with all Court Orders.

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10 DATED: **September 27**, 2024

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12 HON. R. GARY KLAUSNER
13 U.S. DISTRICT JUDGE
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